May 5, 1987

Ms. Randi Lowenthal
Director of Administration
Thacher Proffitt & Wood
Two World Trade Center, 39th Floor
New York, New York 10048

Dear Randi:

The following is in response to your letter of April 29, 1987 regarding the presence of asbestos in the materials used to fireproof the structural steel members of the 39th and 40th floors of Two World Trade Center.

During the early stages of construction of the One World Trade Center, the use of asbestos fireproofing materials was halted and asbestos free materials were substituted except in specific areas such as elevator shafts where, because of the velocity of the elevator cars, it was necessary to continue with the use of asbestos fireproofing since there was no available substitute at that time. In this situation the material was encased in a concrete-like mixture which was self-encapsulating and thereby prevented the escape of asbestos fibers into the air.

Extensive sampling and testing has been performed of the materials used to fireproof the structural steel and decking on the 39th and 40th floors of Two World Trade Center. All sampling of fireproofing material was conducted in accordance with procedures outlined in the United States Environmental Protection Agency (U.S.E.P.A.) publication, "Guidance for Controlling Asbestos containing Material in Buildings". The testing of these samples was conducted at the laboratory of the Port Authority Public Safety Department which is a participant in the U.S.E.P.A. Bulk Asbestos Sample Quality Assurance Program.

The results of the tests, in accordance with applicable guidelines, are as follows:

	Total Samples	Number of Samples Positive for Asbestos Containing Materials	% of Asbestos in Each Positive Sample
39th Floor (40,000 sq.ft)	44	1 (1 in convector)	8%
40th Floor (40,000 sq.ft)	54	22	5-30%

Our sampling has indicated the presence of asbestos-containing material on the structural steel and decking on the 40th floor of Two World Trade Center. In a search of the construction records of the World Trade Center to determine the source of this and other unanticipated asbestos containing materials, Port Authority staff recently learned that the ceiling of the 40th floor was required to be sound insulated from the mechanical equipment room situated on the 41st floor. The sound insulation was to be accomplished by the installation of rigid insulation styrofoam applied to the underside of the 41st floor. The Contractor requested and received approval to substitute spray-on fireproofing for sound insulating styrofoam boards providing the spray-on sound proofing received a Calco Mark II overspray to achieve a hard coat.

It is my belief at this time that the basic sound proofing spray-on material was Cafco Type D-CF, an asbestos free material, that was oversprayed with a Cafco Mark II Hard Coat, an asbestos containing material. At our meeting held two weeks ago, a plan of the 40th floor was furnished to you indicating the locations at which testing samples were taken, those samples which indicated the presence of asbestos, and the percent of asbestos by weight for the samples indicating the presence of asbestos. Approximately one-quarter of the floor plan of the 40th floor indicated no asbestos containing spray-on material. It is likely the Contractor failed to apply the Mark II Hard Coat to this area.

In supplement to the 40th floor plan previously furnished, attached are copies of the bulk-sampling results from the Port Authority's laboratory.

If you wish to conduct your own bulk-sampling analysis, we would appreciate it if you would forward a copy of the laboratory report to us. I have attached a list of environmental engineering firms who perform this type of service and are considered knowledgeable in their field.

As per your request, air-monitoring has not been conducted in your premises but it can be arranged at your convenience.

Please be advised that, in accordance with Occupational Safety & Health Administration rules and regulations issued in 1986, as well as the new New York City Local Law #76, all tenants planning alterations in areas in which asbestos containing materials are present and may be disturbed are required to comply with these Occupational Safety & Health Administration rules and include asbestos abatement specifications in the construction of work. Asbestos abatement specifications acceptable to the Port Authority will be made available to you by the World Trade Planning Division at your request. In any event, any planned alteration work will not be given approval to proceed unless it contains asbestos abatement requirements acceptable to the Port Authority.

We will be available to meet with you and any others concerned, including any Consultants you choose, to discuss procedures and alternatives in dealing with the presence of asbestos containing materials.

Sincerely,

D. Montalbano

Dominick Montalbano
Assistant Director for
Physical Facilities
World Trade & Economic Development

cc: T. Donovan, R. Linn, A. Preschle

bcc: F. Boyce, J. Carlock, L. Sanchez, A. Vaccaro